



March 6, 2017

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Notice of Ex Parte Communication, MB Docket Nos. 14-50, 09-182, 07-294, 04-256, 16-306, 12-268

Dear Ms. Dortch:

More than 75 broadcasters and state broadcast association representatives from 38 states, accompanied by the undersigned of the National Association of Broadcasters, visited the Commission on March 2, 2017 for meetings with Alison Nemeth of Chairman Ajit Pai's office, J. David Grossman of Commissioner Mignon Clyburn's office, and Robin Colwell of Commissioner Michael O'Rielly's office. The broadcasters whose names appear at the end of this letter shared information about their local communities highlighting the need for changes to the Commission's broadcast ownership limits and their concerns about the Commission's current spectrum auction repacking plan.

Broadcast owners, managers and state association members thanked the Commission for their attention to issues that affect broadcasters. Representatives from Washington to Nebraska and Connecticut to Florida described ownership combinations and sharing arrangements that have allowed broadcasters to reduce infrastructure costs and invest in increased high-quality local coverage – in some cases revitalizing entire communities that felt forgotten. They also talked about the increasingly urgent need to ensure the competitiveness and viability of local news outlets, as newspapers continue to decline. Most of these examples, however, were possible only through a waiver of current Commission rules. Broadcasters hope the FCC will revise its rules so that more communities can benefit from these types of arrangements.

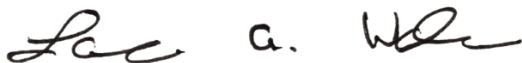
Attendees also expressed concern that the Commission's schedule for repacking television stations following the close of the broadcast spectrum incentive auction will fail to protect

1771 N Street NW
Washington DC 20036 2800
Phone 202 429 5300

viewers from service losses. They noted the apparent lack of flexibility or contingency plans for extreme weather, resource constraints, the high number of translators that will need to be repacked, and potential costs significantly exceeding the \$1.75 billion in available reimbursement funds. Broadcasters also noted that radio antennas are frequently co-located on the same towers with television antennas and the Commission has not provided information about how the repack will impact those radio stations or how the Commission will protect listeners from service losses during repacking.

Finally, broadcasters noted their continued frustration with the large number of pirate radio operations. One broadcaster noted that, on a recent afternoon in Upper Manhattan, he picked up 14 pirate stations on his tuner. The broadcasters urged the Commission to devote the time and resources needed to effectively address this serious problem.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Larry A. Walke". The signature is fluid and cursive, with the first name "Larry" being the most prominent.

Larry Walke
Associate General Counsel
Legal and Regulatory Affairs
National Association of Broadcasters

Cc: Alison Nemeth
J. David Grossman
Robin Colwell

Broadcasters in Attendance		
Klarn DePalma	Meredith	Cheshire, CT
Michael Ryan	Connecticut Broadcasters Association	Avon, CT
Polly Prince Johnson	Louisiana Association of Broadcasters	Baton Rouge, LA
Evan Pappas	KOAA-TV	Colorado Springs, CO
Mike Pumo	Sinclair Broadcasting – West Palm Beach	West Palm Beach, FL
Jon Saunders	Cordillera Communications	Bozeman, MT
Dennis Lyle	Illinois Broadcasters Association	Springfield, IL
Doug Levy	Univision Media	Chicago, IL
Richard Jones	ABC 4	Salt Lake City, UT
Dale Zabriskie	Utah Broadcasters Association	Salt Lake City, UT
Michele Zabriskie	Utah Broadcasters Association	Salt Lake City, UT
Jay Huizenga	KELO-TV	Sioux Falls, SD
Wes Milbourn	Tribune Broadcasting KFOR/KAUT TV	Oklahoma City, OK
Vance Harrison	Oklahoma Association of Broadcasters	Oklahoma City, OK
Susan Ramsett	Gray Television	Lincoln, NE
Jim Timm	Nebraska Broadcasters Association	Omaha, NE
Tim Walker	WTOK-TV	Meridian, MS
David Donovan	New York State Broadcasters Association	Albany, NY
Robert Krummenacker	WBNG-TV Binghamton	Binghamton, NY
Steve Rabb	Tribune Broadcasting (FOX)	Hartford, CT
Kathleen Choal	KSBY-TV Cordillera Communications	San Luis Obispo, CA
Anita Helt	KNXV-TV ABC 15	Phoenix, AZ
Joe Pomilla	WSOC-TV	Charlotte, NC
Charles Marshall	Brooks Pierce	Raleigh, NC
Jack Dempsey	WCYB-TV	Bristol, VA
Monte Loos	KOTA-TV	Rapid City, SD
Bob Singer	KTVZ-TV/KFXO-TV	Bend, OR
Marti Hazel	WDRB-TV	Louisville, KY
Karen Mucci	Kentucky Broadcasters Association	Frankfort, KY
Henry Lackey	Kentucky Broadcasters Association	Frankfort, KY
Brian McDonough	Gray Broadcasting	Springfield, MO
Joe Berry	California Broadcasters Association	Sacramento, CA
Ramon Pineda	Univision	New York, NY
Joe Conti	Pennsylvania Association of Broadcasters	Hummelstown, PA
Suzanne Goucher	Maine Association of Broadcasters	Augusta, ME
Steven Brant	WVII ABC & WFX FOX Bangor	Bangor, ME
Matt Wilson	KSRM Inc.	Kenai, AK
Bob Connell	KFFB Radio	Fairfield Bay, AR
Greg List	O-Town Communications	Ottumwa, IA
Mark Trotman	Eagle Communications	Hutchinson, KS
Dewayne Gandy	Talon Broadcasting	Aurora & Monett, MO
David Kelly	KTCH/KCTY Radio	Wayne, NE

Leonard Wheeler	Wheeler Broadcasting	Roanoke, VA
Carl Gardner	Bonneville Seattle Media Group	Seattle, WA
Nancy Douglass	WLKG	Lake Geneva, WI
Dave Arland	Indiana Broadcasters Association	Carmel, IN
Elena Palombo	Michigan Association of Broadcasters	Lansing, MI
Dewey Bruce	Montana Broadcasters Association	Helena, MT
Michelle Vetterkind	Wisconsin Broadcasters Association	Madison, WI
Laura Grott	Wyoming Association of Broadcasters	Cheyenne, WY
Jim DuBois	Minnesota Broadcasters Association	Minneapolis, MN
Carmelita Palmer	iHeartMedia Huntsville	Huntsville, AL
Trila Bumstead	Ohana Media Group	Oregon
Sharon Tinsley	Alabama Broadcasters Association	Hoover, AL
Gary Mincer	iHeartMedia	Cleveland, OH
Christine Merritt	Ohio Association of Broadcasters	Columbus, OH
Ben Downs	Bryan Broadcasting	College Station, TX
Kathy Browne	CBS Radio	Farmington, CT
Bob Call	Bonneville Denver	Denver, CO
Justin Sasso	Colorado Broadcasters Association	Denver, CO
Chris Leonard	Hawaii Association of Broadcasters	Hilo, HI
Jamie Hartnett	Hawaii Association of Broadcasters	Honolulu, HI
Larry Newton	Boise State Public Radio	Boise, ID
Carl Strube	Port Broadcasting – WNBP-AM	Newburyport, MA
Ed Levine	Galaxy Communications	Syracuse, NY
Karole White	Michigan Association of Broadcasters	Lansing, MI
Mark Gordon	Missouri Broadcasters Association	Jefferson City, MO
Alex Snipe	Glory Communications	Columbia, SC
Margaret Wallace	South Carolina Broadcasters Association	Columbia, SC
David Richards	WOON-AM Radio	Woonsocket, RI
Mary Ann Armijo	iHeartMedia Gallup	Gallup, NM
Gabriel Duke Armijo	iHeartMedia Gallup	Gallup, NM
J Chapman	Woof Boom Radio	Muncie, IN
Jeff Andrulonis	Colonial Radio Group	Olean, NY
Bob Houghton	Georgia Association of Broadcasters	Atlanta, GA
Shuneca Harrington	WRBL-TV	Columbus, GA
Brad Streit	Raycom Media	Montgomery, AL
Tracey Rogers	Raycom Media, WMC-TV	Memphis, TN
Bobby Taylor	New Jersey Broadcasters Association	Monroe Township, NJ

National Association of Broadcasters	
Jerianne Timmerman	
Erin Dozier	
Patrick McFadden	
Scott Goodwin	
Emmy Parsons	

Sue Keenom
Adam Sandler